

News Corp EU/EEA/UK Alertline Privacy Notice

News Corp is committed to ensuring ethical business conduct and compliance with applicable legal obligations and its policies.

In connection thereto, News Corp provides a global toll-free telephone number and a secure internet helpline (known as the "Alertline") for use by employees and other individuals who have acquired information on law violations (as described below) in a work-related context (such as reports of violations by current and former employees or non-employees (including, but not limited to, consultants, independent contractors, job applicants, suppliers, shareholders, volunteers, freelancers) of News Corp and its affiliates and subsidiaries (affiliates and subsidiaries are each referred to herein as a "Business Unit") (News Corp and the Business Units are collectively referred to herein as, "the Company"). This Privacy Notice explains how we collect, use and disclose Personal Data in connection with the Alertline. "Personal Data" means any information relating to an identified or identifiable individual that is processed via the Alertline.

How To Use the Alertline

The Company Alertline is available 24 hours a day, 7 days a week, 365 days a year for you to ask questions, or report compliance-related concerns. You may use the Alertline to report concerns that may significantly affect the interests of the Company including, but not limited to matters regarding accounting, auditing, banking and other financial matters, matters relating to internal accounting controls and reporting, fraud and misconduct, corrupt practices, bribery, insider trading, other financial crimes, and certain violations of EU law, including: public procurement, financial services, products and markets, prevention of money laundering and terrorist financing, product safety, transport safety, public health, protection of the environment, consumer protection affecting the financial interest of the EU or relating to the internal market (e.g., competition and State aid rules, radiation protection and nuclear safety, food safety and animal health and welfare), protection of privacy, data protection and data security. In addition to the above, in the countries below, reports may also relate to the following:

- In France, you may also report about: (i) actual and attempted violations of international law applicable in France; (ii) crimes or offenses under national law; and (iii) threats or harm to the public interest.
- In Ireland, you may also report about the knowledge that: (i) an offence has been, is being or is likely to be committed; (ii) a person has failed, is failing or is likely to fail to comply with any legal obligation, other than one arising under the worker's contract of employment or other contract whereby the worker undertakes to do or perform personally any work or services; (iii) a miscarriage of justice has occurred, is occurring or is likely to occur; (iv) the health or safety of any individual has been, is being or is likely to be endangered; (v) the environment has been, is being or is likely to be damaged; (vi) an unlawful or otherwise improper use of funds or resources of a public body, or of other public money, has occurred, is occurring or is likely to occur; (vii) an act or omission by or on behalf of a public body is oppressive, discriminatory or

grossly negligent or constitutes gross mismanagement; (viii) a breach has occurred, is occurring or is likely to occur; or (ix) information tending to show any matter falling within paragraphs (i) to (ix) above has been, is being or is likely to be concealed or destroyed or an attempt has been, is being or is likely to be made to conceal or destroy such information.

- In Sweden, you may also report violations of laws or other regulations covered by Chapter 8 of the Instrument of Government (Kungörelse (1974:152)), or information on misconduct in a work-related context that is of public interest (i.e., serious misconduct). Note that reports in Sweden cannot cover classified information under the Protective Security Act (2018:585) and information in the field of defense and national security.

You can submit a report via the web or identify the applicable telephone number by visiting <https://newscorp.alertline.com>.

If you prefer, you can request a physical meeting to report your concern.

You can also report these types, as well as any other concerns via regular reporting channels made available by each respective Business Unit, including through your manager or Company contact, Human Resources or the Legal Department (either in your or the relevant Business Unit or at News Corp), your or the relevant Business Unit's Compliance Officer or any other designated employee who oversees compliance for the relevant business or the News Corp Group Chief Compliance Officer responsible for the relevant Business Unit.

If you believe that the circumstances are such that you cannot communicate your concern through the regular reporting channels described above, or the Alertline, you may communicate directly with the Lead Director of the Company's Board, by addressing a letter to the attention of Lead Director, at News Corp, 1211 Avenue of the Americas, New York, New York 10036, or by email to leaddirector@newscorp.com.

Note that in some jurisdictions you will also have the right to report your concerns about violations of EU laws externally to competent authorities. You have this right if:

- (i) the Alertline does not function properly
- (ii) your report was not dealt with diligently or within a reasonable timeframe
- (iii) no appropriate action was taken to address your concerns despite the results of the related internal inquiry confirming the existence of a violation of an EU law; or
- (iv) you have valid reasons to believe that:
 - you will experience retaliation regarding an internal report;
 - the person involved in the wrongdoing is responsible for receiving internal reports;
 - there is a risk the organization will conceal or destroy evidence; or
 - the breach requires urgent action to safeguard health, safety, or the environment.

The following are the applicable competent authorities, as of the date this Notice was last updated:

Country	Competent Authority
Bulgaria	Competent authority yet to be appointed.
France	The Defender of Rights (Défenseur des Droits) is the key competent authority, although others have been appointed for specific sectors.
Germany	Competent authority yet to be appointed.
Ireland	Office of the Protection Disclosures Commissioner.
Italy	Competent authority yet to be appointed.
Netherlands	Dutch Whistleblowers Authority
Poland	Competent authority yet to be appointed.
Romania	Competent authority yet to be appointed.
Spain	Competent authority yet to be appointed.
Sweden	<ol style="list-style-type: none"> 1. Swedish Work Environment Authority (Sw. <i>Arbetsmiljöverket</i>) 2. Swedish Competition Authority (Sw. <i>Konkurrensverket</i>) 3. Swedish Financial Supervisory Authority (Sw. <i>Finansinspektionen</i>) 4. Swedish Estate Agents Inspectorate (Sw. <i>Fastighetsmäklarinspektionen</i>) 5. Swedish Inspectorate of Auditors (Sw. <i>Revisorsinspektionen</i>) 6. Swedish Gambling Authority (Sw. <i>Spelinspektionen</i>) 7. Swedish National Board of Housing, Building and Planning (Sw. <i>Boverket</i>) 8. Swedish Electrical Safety Agency (Sw. <i>Elsäkerhetsverket</i>) 9. Public Health Agency of Sweden (Sw. <i>Folkhälsomyndigheten</i>) 10. Swedish Chemicals Agency (Sw. <i>Kemikalieinspektionen</i>) 11. Swedish Consumer Agency (Sw. <i>Konsumentverket</i>) 12. Swedish Food Agency (Sw. <i>Livsmedelsverket</i>) 13. County Administrative Board of Stockholm (Sw. <i>Länsstyrelsen Stockholm</i>) 14. County Administrative Board of Västra Götaland (Sw. <i>Länsstyrelsen Västra Götaland</i>) 15. County Administrative Board of Skåne (Sw. <i>Länsstyrelsen Skåne län</i>) 16. Swedish Inspectorate of Strategic Products (Sw. <i>Inspektionen för strategiska produkter</i>) 17. Swedish Medical Products Agency (Sw. <i>Läkemedelsverket</i>) 18. Swedish Civil Contingencies Agency (Sw. <i>Myndigheten för samhällsskydd och beredskap</i>) 19. Swedish Environmental Protection Agency (Sw. <i>Naturvårdsverket</i>) 20. Swedish Post and Telecom Authority (Sw. <i>Post- och telestyrelsen</i>) 21. Swedish Energy Agency (Sw. <i>Statens energimyndighet</i>) 22. Swedish Board of Agriculture (Sw. <i>Statens jordbruksverk</i>)

	<p>23. Swedish Board for Accreditation and Conformity Assessment (Sw. <i>Styrelsen för ackreditering och teknisk kontroll</i>)</p> <p>24. Swedish Transport Agency (Sw. <i>Transportstyrelsen</i>)</p> <p>25. Swedish Agency for Marine and Water Management (Sw. <i>Havs- och vattenmyndigheten</i>)</p> <p>26. Swedish Forest Agency (Sw. <i>Skogsstyrelsen</i>)</p> <p>27. Swedish Radiation Safety Authority (Sw. <i>Strålsäkerhetsmyndigheten</i>)</p> <p>28. Swedish Health and Social Care Inspectorate (Sw. <i>Inspektionen för vård och omsorg</i>)</p> <p>29. Swedish Authority for Privacy Protection (Sw. <i>Integritetsskyddsmyndigheten</i>)</p> <p>30. Swedish Economic Crime Authority (Sw. <i>Ekobrottsmyndigheten</i>)</p> <p>31. Swedish Tax Agency (Sw. <i>Skatteverket</i>)</p> <p>32. Government Offices of Sweden (Sw. <i>Regeringskansliet</i>)</p> <p>The Swedish Work Environment Authority is designated as a <u>supervisory</u> as well as <u>specialty competent authority</u>:</p> <ul style="list-style-type: none"> ○ As a <u>supervisory authority</u>, it is responsible for ensuring that organizations comply with their obligations to have internal reporting channels and procedures under the Swedish Whistleblowing Act. ○ As a <u>specialty competent authority</u>, it also receives information from the other competent authorities on the reports made in their external reporting channels.
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Anonymous and Non-Anonymous Reports

The use of the Alertline is voluntary. Please note that while you are encouraged to identify yourself when making a report to the Alertline, you are not obligated to do so. The Company will accept anonymous reports to the extent permitted by applicable law.

Please note that the information you supply may result in decisions that affect individuals at the Company and other third parties involved in the relevant incident. We therefore ask you to provide only information that, to the best of your knowledge, is accurate. Knowingly providing inaccurate or misleading information may result in disciplinary actions or even civil or criminal liability. Also, where possible, any report should be limited to facts that are relevant to the report and the follow-up investigation.

Informing Implicated Individuals

The Company aims to inform each person implicated in a report about the allegations against him or her within an appropriate time frame, but will seek not to disclose your identity. Depending on the jurisdiction, implicated individuals will have the right to react to the information reported by you.

Zero Retaliation Policy

Retaliation against any Company employee or any individual who seeks advice, raises a concern, or reports misconduct in good faith is strictly prohibited. If an individual

retaliates against an employee or individual who has truthfully and in good faith reported a violation, the Company will take appropriate action — even if it later turns out that the employee or individual was mistaken in reporting the matter originally. If you think that you, or anybody else involved, have been retaliated against for raising a concern, you should contact the News Corp Group Chief Compliance Officer responsible for your or the relevant Business Unit, or call the Alertline immediately.

Personal Data We Collect

We collect Personal Data as necessary to comply with legal obligations and otherwise to pursue our legitimate interests in investigating a report.

Reports made via the Alertline may contain Personal Data, especially employment-related Personal Data (e.g., name, title, relationship to Company, Business Unit, location, contact details). When you use the Alertline website, you will be prompted to submit your name and contact details (in some jurisdictions where you cannot report anonymously this may be required), the nature of your report including the date and location, the identities of individuals about whom a report is made, as well as any other pertinent information, and any questions that you may have. You may also be asked to clarify key points of the facts provided. At the end of your submission, you will be provided with a reference number relating to the report.

When you call the Alertline telephone number, a similar information gathering process is conducted by a specialist from our third party service provider, NAVEX (see below), who will ask about the nature of your call, seek to clarify key points and collect further details as required, and take notes during the call to record the facts provided.

After the report is submitted (either via the website or telephone), a notification is sent directly to the team overseeing the Alertline in New York, NY, U.S and, in certain cases, London, United Kingdom for further investigation. We might need additional information and clarifications from you as the investigation progresses, in which case we will contact you again. The team will evaluate the information provided and may conduct an investigation, or may work with the relevant Business Unit or outside counsel to conduct an investigation, or have the relevant Business Unit and/or local counsel conduct the investigation. When appropriate, we will inform you of the investigation's progress and the actions taken following the outcome of the investigation. The outcome of the investigation may also be documented in a final report.

We may also collect Personal Data from other sources (such as from colleagues and publicly available sources) during the investigation. The Personal Data provided by you will be treated confidentially. NAVEX does not capture the telephone number of any incoming calls so that your call-in information can remain anonymous. NAVEX also does not record the calls. Please note that the specialist from NAVEX is not able to answer any questions about ethics or policy and cannot advise you on any course of action.

How We Use and Share Personal Data

We use Personal Data for the purposes of managing the Alertline, creating a report and investigating a report. Depending on the nature of the matter, the Alertline Global Response Team may share the report and related documentation with your employer and other appropriate personnel at the Company, such as representatives of Legal, Human Resources, Compliance or Corporate Audit, and/or outside consultants and counsel.

Where necessary, those conducting the investigation may also need to notify members of Human Resources or management of any finding of violation for purposes of determining any disciplinary action and for transparency purposes.

Information may also be shared with the Company's external advisers (such as lawyers, accountants, financial advisors and/or auditors); affiliates and service providers providing support services; government authorities and agencies (such as regulators, courts and/or law enforcement); and any relevant party if we have a good faith belief that such disclosure is necessary to meet any applicable law, regulation, legal process or other legal obligation; detect, investigate and help prevent security, fraud or technical issues; and/or protect the rights, property or safety of the Company, our employees or others; and as part of a corporate transaction, such as a transfer of assets to, or an acquisition by or merger with, another company.

Third Party Service Provider

The Alertline is operated on behalf of the Company by NAVEX, a service provider in the United States. We require NAVEX by contract to process Personal Data on our behalf only and to implement appropriate technical and organizational measures to protect the confidentiality and security of your Personal Data in compliance with applicable law.

Your Rights

Subject to and as provided under applicable laws, you may have the right to request access, correct, update, erase or restrict the processing of your Personal Data, or object to its processing. If you wish to exercise any of these rights, you may contact your or the relevant Business Unit's Compliance Officer or any other designated employee who oversees compliance for the relevant business or the [News Corp Group Chief Compliance Officer](#) responsible for the relevant Business Unit. If processing of your Personal Data falls under the application of the EU/UK laws, you also have the right at all times to lodge a complaint regarding your Personal Data with a supervisory authority competent for your country or region.

Data Security and Data Retention

We have implemented technical and organizational measures to protect your Personal Data against accidental or unlawful destruction, loss, alteration, unauthorized disclosure or access. We make reasonable efforts to ensure a level of security appropriate to the risk of the data processing, taking into account the costs of implementation and the nature of the processing.

Information, including Personal Data, relating to a report will be retained in accordance with the Company's Records Management Policy and applicable Records Retention Schedules. The retention period may be extended if necessary to complete other procedures and/or to comply with legal requirements.

Data Transfers

We are part of a global organization. Your Personal Data may be transferred to, stored or accessed by Company personnel worldwide for the purpose of managing the Alertline and investigating a report. When your Personal Data are transferred to (or accessed from) a country outside the UK or EEA for which the UK or European Commission has not issued an adequacy decision or outside your location, we will implement appropriate safeguards to ensure that your Personal Data remain protected. This includes standard contractual clauses and other data transfer agreements, a copy of which you can obtain by contacting us as indicated in the "Contact Us" section below.

Changes

We will update this privacy notice from time to time. Any changes will be posted on this page with an updated revision date. If we make any material changes, we will provide notice through the Alertline or by other means.

Contact Us

The entity responsible for the collection and processing of your Personal Data in the context of the Alertline is News Corporation, 1211 Avenue of the Americas, New York, NY 10036, U.S.A. If you have any questions or concerns about how your Personal Data is processed in the context of the Alertline, or if you wish to exercise your rights, please contact your or the relevant Business Unit's Compliance Officer or any other designated employee who oversees compliance for the relevant business or the [News Corp Group Chief Compliance Officer](#) responsible for the relevant Business Unit.

For more information on how the Company processes Personal Data in the employment context, please refer to your Business Unit's Employee Privacy Notice and the relevant Business Unit's Non-Employee Privacy Notice, as applicable to you.

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